



WILLIAMS, PORTER, DAY & NEVILLE P.C.
Wyoming's Law Firm

Exhibit C

Amazon Defendants' Motion for Protective Order
DeBeer v. Amazon Logistics, Inc., et al.

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Attorneys for Plaintiff

**IN THE UNITED STATES DISTRICT COURT
 FOR THE DISTRICT OF WYOMING**

KIMBERLY DEBEER, surviving spouse)
 and wrongful death personal)
 representative of)
 DANIEL DEBEER, deceased,)
)
 Plaintiff,)

v.) Civil Action #2:23-cv-33-ABJ

AMAZON LOGISTICS, INC.,)
 d/b/a PRIME,)
 AMAZON.COM, INC.,)
 AMAZON.COM SERVICES, LLC,)
 AAF555 LLC,)
 NORTHWEST EXPRESS LLC,)
 ASD EXPRESS, LLC and)
 JUSTIN NZARAMBA,)
)
 Defendants.)

PLAINTIFF'S INITIAL DISCLOSURES

Plaintiff, Kimberly DeBeer, surviving spouse and wrongful death personal representative of Daniel DeBeer, deceased, by and through her undersigned counsel, makes the following initial disclosures pursuant to Fed. R. Civ. P. Rule 26(a)(1):

A. Individuals with Discoverable Information

1. Kimberly DeBeer
c/o Matthew Wright
The Law Firm for Truck Safety, LLP
840 Crescent Center Dr., Ste. 310
Franklin, TN 37067

Kimberly DeBeer is the Plaintiff in this matter and the wife of Daniel DeBeer, deceased. Mrs. DeBeer has information about the damages she and her three (3) sons sustained as a result of her husband's death in this matter. Plaintiff must be contacted only through her attorneys of record.

2. Trooper Joshua Powell, Badge No. 95
Wyoming Highway Patrol
District E, Troop 3
3200 Elk Street
Rock Springs, WY 82902
(307) 352-3108

Trooper Josh Powell is employed by Wyoming Highway Patrol and investigated the crash which is the subject of Plaintiff's Complaint after-the-fact, including conducting an interview of Defendant Nzaramba, and can give detailed knowledge regarding the same.

3. Trooper Ryan Wille
Wyoming Highway Patrol
District E, Troop 3
3200 Elk Street
Rock Springs, WY 82902
(307) 352-3108

Trooper Ryan Wille is employed by Wyoming Highway Patrol and was on the scene after-the-fact. Trooper Wille took extensive scene photographs and interviewed witnesses at the scene of the crash that is the subject of Plaintiff's Complaint and can give detailed knowledge regarding the same.

4. Trooper Marc Russell
Wyoming Highway Patrol
District E, Troop 3
3200 Elk Street
Rock Springs, WY 82902
(307) 352-3108

Trooper Marc Russell is employed by Wyoming Highway Patrol and was the supervising officer of Joshua Powell who was on the scene after-the-fact. Trooper Russell supervised the investigation of scene of the crash that is the subject of Plaintiff's Complaint by Trooper Joshua Powell and contacted Plaintiff Kimberly DeBeer to advise her of the crash and her husband's death and can give detailed knowledge regarding the same.

5. Trooper Austin Bluemel,
Wyoming Highway Patrol
District E, Troop 3
3200 Elk Street
Rock Springs, WY 82902
(307) 352-3108

Trooper Austin Bluemel is employed by Wyoming Highway Patrol and was on the scene after-the-fact. Trooper Bluemel took photographs of GPS information and assisted with the investigation of the crash that is the subject of Plaintiff's Complaint and can give detailed knowledge regarding the same.

6. Trooper Karl Germain
Wyoming Highway Patrol

District E, Troop 3
3200 Elk Street
Rock Springs, WY 82902
(307) 352-3108

Trooper Karl Germain is employed by Wyoming Highway Patrol authored a Case Detail Report on April 5, 2021 describing his conversation with Plaintiff Kimberly DeBeer and can give detailed knowledge regarding the same.

7. Owners and Employees of
Marshall's Towing
50096 S. Highway #191
Rock Springs, WY 82901
(307) 362-2460

These individuals were present on the scene after-the-fact to tow away the tractor-trailers involved in the crash which is the subject of Plaintiff's Complaint and would have knowledge regarding the severity of the crash.

8. Owners and Employees of
Stauffers Towing
32 Wilkins Peak Drive
Rock Springs, WY 82901
(307) 222-4421

These individuals were present on the scene after-the-fact to tow away the tractor-trailers involved in the crash which is the subject of Plaintiff's Complaint and would have knowledge regarding the severity of the crash.

9. Dale Majhanovich, County Coroner
Office of the Sweetwater Coroner
421 "B" Street
Rock Springs, WY 82901
(307-350-8352)

Dale Majhanovich is the Sweetwater County Coroner who pronounced Mr. DeBeer deceased on March 31, 2021 as a result of craniocerebral trauma due to blunt impact due to motor vehicle accident, completed the Coroner's Report and

signed Daniel DeBeer's Death Certificate and can give detailed knowledge regarding the same.

10. Employees, representatives and officers of
Amazon Logistics, Inc., d/b/a PRIME.
Amazon.com, Inc., and Amazon.com Services, LLC
c/o Stuart R. Day
WILLIAMS PORTER DAY & NEVILLE
159 North Wolcott, Suite 400
P.O. Box 10700
Casper, WY 82602

Safety Director(s)
Human Resources professionals
Records custodians
Officers
Supervisors
Dispatchers
Truck Drivers

The above-listed Amazon Defendants partnered with Defendants Northwest Express, LLC and/or AAF555, LLC and/or ASD Express, LLC for delivery of the cargo contained in the Amazon trailer involved in the crash that is the subject of Plaintiff's Complaint. The names of the employees are not in possession of Plaintiff but are presumed to be in the possession of the Defendant.

11. Justin Nzaramba
c/o Zenith S. Ward
Buchhammer & Ward, PC
1821 Logan Avenue
P.O. Box 568
Cheyenne, WY 82003-0568

Justin Nzaramba was the driver of the trailer-truck under the motor carrier authority of Defendant, Northwest Express, LLC, and has first-hand knowledge of the events which caused the crash and the severity of the crash which is the subject of Plaintiff's Complaint.

12. Owners, Employees and Representatives of
Northwest Express, LLC and AAF555, LLC
c/o Zenith S. Ward
Buchhammer & Ward, PC
1821 Logan Avenue
P.O. Box 568
Cheyenne, WY 82003-0568

The employees would include, but are not limited to:

Safety Director(s)
Human Resources professionals
Records custodians
Officers
Supervisors
Dispatchers
Truck Drivers

Defendant Northwest Express, LLC and/or Defendant ASD Express, LLC are motor carriers that employed Defendant Justin Nzaramba for the purpose of delivering interstate cargo and who was involved in the crash which is the subject of this lawsuit. The names of the employees are not in possession of Plaintiff but are presumed to be in the possession of the Defendant.

13. Owners, Employees and Representatives of
ASD Express, LLC
c/o Jodie Booth, Statutory Agent
2796 Road 58
Veteran, WY 82243

The employees would include, but are not limited to:

Safety Director(s)
Human Resources professionals
Records custodians
Officers
Supervisors
Dispatchers
Truck Drivers

This Defendant is a motor carrier that Defendant Justin Nzaramba identified as the motor carrier that employed him for the purpose of delivering interstate cargo and who was involved in the crash which is the subject of this lawsuit. The names of the employees are not in possession of Plaintiff but are presumed to be in the possession of the Defendant.

14. Tim and Nancy Rider
Rock Springs, WY

Mr. and Mrs. Rider were traveling westbound on I-80 behind Defendant Nzaramba's vehicle and witnessed the Defendant swerve off the road, through the median and into Mr. DeBeer's tractor. Tim Rider helped the Defendant out of his tractor and identified Mr. DeBeer lying on the ground at the scene and can give detailed knowledge regarding the events.

15. Plaintiff anticipates she will have family members, friends and beneficiaries who have knowledge and may testify as to relationship between the family members of the DeBeer family. Plaintiff will supplement this disclosure.

B. Relevant Documents, Electronically Stored Information and Tangible Things

Attached are copies, contained in electronic format, of documents, electronically stored information, and tangible things that Plaintiff's counsel has in their possession, custody or control, or are expected to be obtained during discovery, that Plaintiff may use to support her claims and are identified as follows:

1. Plaintiff's Complaint.
2. Answer of Defendant Amazon Logistics, Inc., d/b/a PRIME.
Amazon.com, Inc. and Amazon.com Services, LLC.

3. Answer of Northwest Express, LLC and Justin Nzaramba.
4. Answer of AAF555, LLC.
5. Bill of Lading from Shipper Amazon Fulfillment Services.
6. Wyoming Investigator's Traffic Crash Report for Case No. 21-00030827, which is equally available to all parties.
7. Wyoming Highway Patrol Investigative File for Case No. 21-00030827, including but not limited to the Case Detail Report authored by Trooper Joshua Powell, Supplement Narrative Case Detail Report authored by Trooper Austin Bluemel, and Supplement Narrative Case Detail Report authored by Trooper Karl Germain, which are equally available to all parties.
8. Photographs and video recordings taken at the scene of the crash.
9. Dash Cam and Body Cam video and audio files from the scene of the crash received from Wyoming Highway Patrol, which are equally available to all parties.
10. 911 Dispatch and Rock Springs Radio Traffic Recordings for March 31, 2021, which are equally available to all parties.
11. Sweetwater County Court documents pertaining to *State of Wyoming vs. Nzaramba, Justin*, March 31, 2021, Citation Number WHP145693AB, for violation of WY State § 31-5-209 (a)(i), Driving on roadways laned for traffic.
12. Iowa County Court documents pertaining to *State of Iowa vs. Nzaramba, Justin*, Case No. 04781 STA0297795 (Pottawattamie), Citation No.

P0311VE2103270009017, for Failure to Maintain Control on March 27, 2021.

13. Death Certificate of Daniel DeBeer.
14. Sweetwater County Coroner's Report of Daniel DeBeer and autopsy photographs, which are equally available to all parties.
15. Obituary and Daniel DeBeer's Memorial Service video.
16. Photographs and videos of Daniel DeBeer, his family and friends.
17. Personal and business income tax returns.
18. Ohio Secretary of State documents pertaining to companies formed by Bakhtier Azzizkhodjaev, which are equally available to all parties.
19. Documents and data that are in the possession of the defendants for which discovery has only recently begun.
20. As discovery is ongoing, Plaintiff anticipates these Disclosures may be supplemented as additional information is obtained.

C. Computation of Each Category of Damages

The following categories of damages have yet to be determined and/or are for determination by a Wyoming Federal Court Jury. These computations may also be supplemented through expert testimony and lay witness testimony:

1. Loss of love, society of Daniel DeBeer, including loss of companionship, consortium, care, assistance, attention, protection, advice, guidance, counsel, instruction, training, and education suffered by his survivors;
2. funeral expenses for Daniel DeBeer; and

3. the present cash value of the pecuniary value of the life of Daniel DeBeer, including the lost earnings over his life expectancy and the reasonable loss of consortium suffered by his survivors and the next of kin for the loss of tangible services provided by him, as well as intangible benefits each family member receives from the continued existence of other family members. Such intangible benefits include love, affection, attention, education, guidance, care protection, training, companionship and cooperation that the survivors and next of kin would reasonably be certain to have received during the life of the deceased.
4. At trial, it is anticipated Plaintiff's Counsel would present proof of and argument on that these damages to Plaintiff and her beneficiaries is no less than \$100,000,000.00.

D. Insurance

Plaintiff does not have any insurance agreements that are required to be disclosed.

Plaintiff reserves the right to supplement as discovery progresses.

DATED this 12th day of June, 2023.

THE LAW FIRM FOR TRUCK SAFETY, LLP

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Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on this 12th day of March 2023 a true and correct copy of the foregoing was served via electronic mail to the following:

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